Exhibit 6

FISH.
FISH & RICHARDSON

Fish & Richardson P.C.
1000 Maine Avenue, S.W.
Suite 1000
Washington, DC 20024

202 783 5070 main
202 783 2331 fax

Thad Kodish
Principal
tkodish@fr.com
+1 404-724-2792 direct

January 24, 2025

VIA E-MAIL

Russ August & Kabat
12424 Wilshire Boulevard
12th Floor
Los Angeles, CA 90025
Phone: 310-826-7474

Miller Fair Henry
1507 Bill Owens Pkwy
Longview, Texas 75604
Phone: 903-757-6400

Re: *Headwater Research LLC v. Samsung Electronics Co., Ltd. et al.,* **Case No. 2:23-cv-00641 (E.D. Tex.)**

Dear Counsel:

Samsung Electronics Co., Ltd. ("**Samsung**") has filed two *inter partes* review (IPR) petitions (IPR2024-01396 and IPR2024-01397) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-19 of U.S. Patent No. 9,647,918 ("**the '918 Patent**"). The tables in attached Appendix A list all grounds, challenged claims, and references asserted in IPR2024-01396 and IPR2024-01397.

I write to inform you that Samsung hereby stipulates that if the PTAB institutes IPR2024-01396 or IPR2024-01397, Samsung agrees not to pursue any grounds raised in the IPRs, any grounds raised within Samsung's invalidity contentions that were raised or could have been raised in the IPRs, or any grounds Samsung could have reasonably raised before the PTAB, in this district court litigation or any parallel proceeding. *Sotera Wireless, Inc. v. Masimo Corp.,* Case IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). Samsung reserves the right to assert in the District Court proceedings prior art that is not eligible for PTAB consideration, e.g., the system art noted in Appendix B below.[1] Samsung's reservation is consistent with a *Sotera* stipulation because the grounds listed in Appendix B are based on prior art that is ineligible for consideration before the PTAB, and that could not have been raised before the PTAB.

---

[1] Samsung notes that discovery in the District Court proceedings is currently ongoing and Samsung expects Google, Apple, BlackBerry, and Microsoft to produce additional materials relating to the system art listed in Appendix B below. For the avoidance of doubt, Samsung reserves the right to rely on such forthcoming productions in the District Court proceedings.

fr.com

FISH.

FISH & RICHARDSON

Page 2

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute both IPR2024-01396 and IPR2024-01397, Samsung reserves the right to assert any grounds of invalidity in the District Court proceedings against the '918 Patent.

Sincerely,

Thad Kodish

Attorney for Samsung Electronics Co., Ltd.

2

FISH.
FISH & RICHARDSON

Page 3

Appendix A

Grounds and Prior Art References Used in IPR2024-01396

Ground	Claim(s)	35 U.S.C. § 103
1A	1-3, 8-9, 13-14, 19	Bennett in view of Vadde
1B	4-6, 11, 15-17	Bennett in view of Vadde and Riggs
1C	7, 12, 18	Bennett in view of Vadde, Riggs, and Hendrickson
1D	10	Bennett in view of Vadde, Riggs, and Srikantan

Grounds and Prior Art References Used in IPR2024-01397

Ground	Claim(s)	35 U.S.C. § 103
1A	1, 9, 13-14	Bennett in view of Rakoshitz and Rybak
1B	2-6, 8, 11, 15-17, 19	Bennett in view of Rakoshitz, Rybak, and Riggs
1C	7, 12, 18	Bennett in view of Rakoshitz, Rybak, Riggs, and Henrickson
1D	10	Bennett in view of Rakoshitz, Rybak, Riggs, and Srikantan

List of References

Reference Name	Details
Bennett	U.S. Patent Publication No 2006/0149811
Vadde	U.S. Patent Publication No. 2012/0117478
Rakoshitz	U.S. Patent No. 6,578,077
Rybak	EP Patent Publication No. 1 850 575 A1

3

FISH.
FISH & RICHARDSON

Page 4

Reference Name	Details
Riggs	U.S. Patent No. 8,429,516
Henrickson	U.S. Patent No. 6,754,470
Srikantan	U.S. Patent Publication No. 2002/0056126

Appendix B – System Art

System / OS / Application
Android Devices (e.g., T-Mobile G1/HTC Dream, Samsung GT-I7500 Galaxy, Nexus One, Nexus S, and emulators)
Apple Devices (e.g., iPhone, iPhone 3G, iPhone 3GS, iPhone 4, and emulators)
Windows Mobile Devices (e.g., HTC Ozone, HTC Imagio XV6975, HTC Tilt 2, HTC Pure, Samsung C6620, Samsung SPH-i325 Ace, Samsung Intrepid SPH-i350, and emulators)
BlackBerry Devices (e.g., BlackBerry Bold 9780, BlackBerry Bold 9700, BlackBerry Bold 9000, BlackBerry Curve 3G 9330, BlackBerry Storm 2 9550, BlackBerry Torch 9800, and emulators)
Android including Android 1.0 (released September 2008), Android 1.1 (released February 2009), Android Cupcake (1.5) (released April 2009), Android Donut (1.6) (released September 2009), Android Eclair (2.0, 2.0.1, 2.1) (released October 2009 - January 2010), Android Froyo (2.2) (released May 20, 2010), Android Gingerbread (2.3) (released December 6, 2010)
iPhone OS including iPhone OS 1.0 (released June 29, 2007), iPhone OS 2.0 (released July 11, 2008), iPhone OS 3.0 (released June 19, 2009), iOS 4.0 (released June 21, 2010)
BlackBerry OS 1, BlackBerry OS 2, BlackBerry OS 3 (released March 2002), BlackBerry OS 4.0 (released June 2003), BlackBerry OS 4.1 (released January 2006), BlackBerry OS 4.2 (released June 2007), BlackBerry OS 4.3 (released October 2007), BlackBerry OS 4.5/4.6 (released June 2008), BlackBerry OS 4.7 (released November 2008), BlackBerry OS 5.0 (released August 2009), BlackBerry OS 6.0 (released July 2010)
Windows Mobile including Windows Mobile 6.0 (released February 12, 2007), Windows Mobile 6.1 (released April 1, 2008), Windows Mobile 6.5 (released May 11, 2009), and Windows Phone 7 (released October 2010)
Microsoft Applications (including Microsoft Outlook Mobile, Windows Media Player Mobile, Windows Live, and MyPhone)
Apple Applications (including Mail, iTunes Store, iTunes, Messages, Calendar, MobileMe, Backup, Voicemail, VPN, and Newsstand API)

FISH.
FISH & RICHARDSON

Page 5

System / OS / Application
BlackBerry Applications (including Roxio Media Manager, Email, BlackBerry App World, Podcasts, Preferred Wireless Network List)